

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

United States

\*

**CIVIL NO. 03-CR-220 (PG)**

v.

\*

Reynaldo González-Rivera

\*

Defendant

\*

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**URGENT MOTION REQUESTING CONTINUANCE**

TO THE HONORABLE COURT:

COMES NOW, defendant-appellant, Reynaldo González-Rivera, (“Mr. González-Rivera” or “defendant”), through the undersigned counsel, and hereby INFORMS and PRAYS:

1. By Writ of Habeas Corpus ordered on October 15, 2008, this Court ordered the transfer of Mr. González Rivera from FCI Miami Institution to be re-sentenced before this Court on **December 2, 2008** at 9:30 A.M.
2. After said order was issued, Mr. González Rivera was transferred to MDC Guaynabo, and his records at the FCI Miami Institution were requested. Also, yesterday, probation officer Victor Carlos met with Mr. González Rivera at the Institution, with the undersigned present in order to prepare an amended pre-sentence report prior to the re-sentencing hearing.

United States v. Reynaldo González Rivera  
No. 03-CR-220(PG)  
Urgent Motion Requesting Continuance  
page 2

3. As of the present time, Mr. González-Rivera's records at the Bureau of Prisons have not been sent.

4. In addition, because the above information is still pending to be produced and considering the Thanksgiving Holiday of next week, both the undersigned and the probation officer believe that a pre-sentence report will not be complete until the next three (3) weeks.

5. Moreover, the undersigned will need three (3) additional weeks in which to discuss the pre-sentence report with Mr. González-Rivera and the probation officer; file any necessary objections to said report and a Sentencing Memorandum prior to the sentencing hearing.

**WHEREFORE**, Mr. González-Rivera respectfully requests that considering the above stated reasons, the re-sentencing hearing be rescheduled for mid January of 2009.

**RESPECTFULLY SUBMITTED**

In San Juan, Puerto Rico, this 21<sup>th</sup> day of November 2008.

**S/MARIA SOLEDAD RAMIREZ-**  
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United States v. Reynaldo González Rivera  
No. 03-CR-220(PG)  
Urgent Motion Requesting Continuance  
page 3

**MARIA SOLEDAD RAMIREZ-  
BECERRA**

USDC-PR NO. 206402

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this date this motion was electronically filed in the United States District Court for the District of Puerto Rico and that the same was notified to: **Antonio R. Bazán-González**, Esq., United States Attorney's Office, Criminal Division, 350 Carlos Chardón St., Suite 1201, San Juan, Puerto Rico 00918; **John Ward-Llambias**, P.O. Box 6221, Loiza Station, San Juan, Puerto Rico 00914; **José F. Quetglas**, Quetglas Law Office, P.O. Box 16606, San Juan, Puerto Rico 00908-6606; **Juan J. Hernández-López**, Hernández López de Victoria Law Office, P.O. Box 190233, San Juan, Puerto Rico 00919-0233; **Héctor L. Ramos Vega**, Federal Public Defender's Office, Patio Gallery Building, 241 Franklin D. Roosevelt Ave., Hato Rey, Puerto 00918-2441; **Mr. Reynaldo González-Rivera**, Reg. 26497-069, Federal Correccional Institution, P.O. Box 779800, Miami, Florida 33177

**RESPECTFULLY SUBMITTED**

In San Juan, Puerto Rico, this 21<sup>th</sup> of November 2008.

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